



City of Woodland

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April 23, 2008

Central Valley Regional Water Quality Control Board  
11020 Sun Center Drive #200  
Rancho Cordova, CA 95670

**Re: Comments on February 2008 draft "Amendments to The Water Quality Control Plan for the Sacramento River and San Joaquin River Basins for the Control of Methylmercury and Total Mercury in the Sacramento-San Joaquin Delta Estuary" (hereafter "TMDL")**

Dear Members of the Central Valley Regional Water Quality Control Board:

Thank you for providing the City of Woodland this opportunity to review and comment on the subject TMDL. The City supports the opinions expressed by the Central Valley Clean Water Association (CVCWA) in their April 9, 2008, comment letter to the Board. Specifically, CVCWA requests that the Regional Board:

- 1) Use a different approach for management of methylmercury
- 2) Address the majority of the mercury load to the Delta prior to implementing Phase 2 of this TMDL
- 3) Focus mercury control requirements on total mercury until the linkage between methylmercury sources and mercury in fish tissue is better characterized
- 4) Support rather than discourage mercury offsets
- 5) Promote regional monitoring rather than require discharger-specific receiving water Monitoring

The City of Woodland would like bring to the Board's attention specific aspects of the proposed Basin Plan Amendment (BPA) that would likely have an adverse impact on the City's ability to comply with the methylmercury limits:

As described in Table B of the Proposed Basin Plan Amendment (BPA), the City of Woodland has measured methylmercury levels at or near the testing detection limit. As a result it has been given the lowest Phase 1 concentration limit of 0.06 ng/L and a mass limit of 0.4 g/yr. While the calculations are not provided in the BPA, it appears the Board used an effluent flow of about 5.5 mgd to determine the waste load allocation. The City's effluent flows are already above this level, so the City could be out of compliance if adopted in its current form. The TMDL for total mercury in the City's current permit was calculated using maximum flows which allows the City's ability to address mercury reduction options as the City grows. The City of Woodland requests both mercury TMDL's be applied consistently in the City's current permit using maximum flows instead of average flows.

The draft BPA requests minimum reporting levels for methylmercury at 0.5 ng/L. The City's effluent measurements are typically at or slightly above the method detection limit (MDL) of 0.2 ng/L. Considering the 0.06 ng/L standard, the City would be held to and would report any measurement above 0.02 ng/L MDL.

Finally, the City is considering utilizing more "green technologies" for use and production of electricity at the Wastewater Treatment Plant (WWTP). The facility is at a size that it could incorporate an anaerobic process and utilize biogas for the production of electricity. This concept is utilized by several POTW's included in the survey. It is believed that the POTW's utilizing anaerobic processes, produce higher methylmercury levels than those that use strictly aerobic processes used by the City of Woodland. The City has concerns that the low limits in place would, in effect, restrict the City in utilizing more energy efficient systems in the future.

Thank you for allowing the City of Woodland to comment on this important proposed regulation.

Sincerely,



Greg Meyer/Deputy Director Operations & Maintenance

cc: Karl Longley, Chair  
Katherine Hart, Vice Chair  
Paul Betancourt, Board Member  
Cheryl Maki, Board Member  
Sandra Meraz, Board Member  
Soapy Mulholland, Board Member  
Dan Odenweller, Board Member